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February 5, 2004

451 Florida Street

Document Control Office (DCO) EPA East Building, Room 6428 1201 Constitution Ave., NW Washington, DC 20469

Attention: Chemical Right-to-Know Program – High Production Volume Program

Telephone: 225-388-8011

RE: 1,2-Benzenedicarboxylic acid, 3,4,5,6-tetrabromo-, 2-(2-hydroxyethoxy)ethyl 2-hydroxypropyl ester; CAS No. 77098-07-8

Dear Sir or Madame:

Enclosed please find a 1) Data Summary and Test Plan and 2) Robust Summaries for the above chemical. This information is being submitted on behalf of Albemarle Corporation and Great Lakes Chemical Corporation under the voluntary High Production Volume Program. The original sponsor for this chemical was the CMA Bromiinated Flame Retardant Industry Panel (Consortium ID 1101012). In 2003, the sponsorship was changed to Albemarle Corporation and Great Lakes Chemical Corporation.

The technical contact for this submission is:

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Sincerely,

Ron Zumstein, PhD Vice President Health Safety and Environment

Cc: R. Henrich, Great Lakes Chemical Company